

Joint Submission

March 28, 2019

Honorable Ona T. Wang
United States Magistrate Judge
Southern District of New York
United States Courthouse
500 Pearl Street, Courthouse 20D
New York, New York 10007-1312

Re: King Range, Jr. v. 217 East 26th Street, LLC, et al.
Case No: 1:18-CV-03450-OTW

Dear Judge Wang:

The parties submit this joint letter to report their ongoing, productive discussions to potentially resolve this matter. The Landlord's architect has presented a proposed permanent ramp that would be architecturally and economically feasible. The Plaintiff and his expert are reviewing the drawings of the ramp.

In light of the parties' progress, the parties respectfully request that the discovery deadline be moved from April 22 to May 31. (*See* ECF No. 47 noting the current April 22 discovery date deadline). The parties had served each other with deposition notices and other discovery as placeholders. That discovery is scheduled for the end of this week and the following week. The parties want to pursue settlement dialogue and not discovery with its attendant litigation expense that may not be necessary.

The parties would appreciate the extension so their full efforts can be devoted to trying to resolve this matter. The parties will keep the Court informed of their ongoing efforts and status. Thank you for your consideration of this request.

Respectfully Submitted,

Robert G. Hanski, Esq.

Robert G. Hanski, Esq.
Parker Hanski LLC
40 Worth Street, 10th Floor
New York, New York 10013
Attorneys for Plaintiff
King Range, Jr.

Benjamin D. Bianco, Esq.

Benjamin D. Bianco, Esq.
Meister Seelig & Fein LLP
125 Park Avenue, 7th Floor
New York, New York 10017
Attorneys for Landlord Defendants
217 East 26th Street LLC
217 East 26th Street
Newco LLC

M. William Munno

M. William Munno
Seward & Kissel LLP
One Battery Park Plaza
New York, New York 10004
Attorneys for Tenant Defendant
Tipsy Scoop LLC